

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE: SECOND COMPLAINT OF DISCOUNT
COMMUNICATIONS, INC. AGAINST)
BELLSOUTH TELECOMMUNICATIONS, INC.) DOCKET NO. 00-01151

**RESPONSE OF ATM/DISCOUNT COMMUNICATIONS, INC. TO
BELLSOUTH'S NOTICE OF INTENT TO TERMINATE**

ATM/Discount Communications, Inc. ("Discount") submits the following response to the "Notice" filed by BellSouth Communications, Inc. ("BellSouth") on August 15, 2001. The Notice states that BellSouth intends to terminate service to Discount within five (5) business days or by August 22, 2001.

The Hearing Officer's Order of August 1, 2001, states that "BellSouth shall take no action to implement the terms of its Notice filed on July 25, 2001, until the Authority or Hearing Officer is permitted to hold an evidentiary hearing and order a decision on Discount's Motion to Continue Service and BellSouth's Request regarding provision of service to Discount's customers."

Although the Hearing Officer's Order refers to an earlier BellSouth Notice issued on July 25, it is Discount's understanding that the Order applies as well to the more recent Notice. It is BellSouth's position, however, that the Order does not necessarily apply to the more recent Notice and that, without further instructions from the Hearing Officer, BellSouth may terminate service by August 22.

Therefore, Discount asks that the Hearing Officer direct BellSouth not to terminate service pursuant to the August 15 Notice until after a hearing and decision as described in the August 1 Order of the Hearing Officer.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax to the following on this the 16th day of August, 2001.

Guy Hicks, Esq.
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Henry Walker